

LAW OFFICES OF ERIC A. SHORE

President/Founder
Eric A. Shore ◇

Two Penn Center, Suite 1240
1500 John F. Kennedy Blvd.
Philadelphia, PA 19102
Phone: 215-627-9999
Fax: 215-627-9426

20 Brace Road, Suite 325
Cherry Hill, NJ 08034
Phone: 856-761-1222
Fax: 856-427-4008

1-800-CANT-WORK

August 11, 2023

Associates

Graham F. Baird ◇
Mark Bittner □◇
Lisa Cunningham ◇
Dennis J. Gruenke ◇△
Steven Jarvis ◇
Mary LeMieux-Fillery ◇
Linda M. Lopez ◇
Briana Pearson-Prout ○
Kathleen Redpath-Perez □
Charles M. Scott ○
Valerie C. Shore □

○PA □NJ ◇PA&NJ △MD ◇NY

Via Certified Mail
Boonswang Law Firm
1500 Sansom St #200
Philadelphia, PA 19102

Briana Lynn Pearson, Esquire
Direct Dial 215-944-6113
Direct Telefax (215) 944-6124
BrianaP@ericshore.com

Re: Jennifer Kieu v. Boonswang Law Firm

To Whom it May Concern:

Enclosed please find the Civil Complaint filed in Philadelphia Court.

Thank you for your time. I look forward to hearing from you.

Yours truly,

LAW OFFICES OF ERIC A. SHORE



Briana Lynn Pearson, Esquire

BLP/vh
Enclosure: Complaint

THE LAW OFFICES OF ERIC A. SHORE
 By: Briana Lynn Pearson, Esquire
 Attorney ID No. 327007
 Two Penn Center, Suite 1240, 1500 John F. Kennedy Blvd.
 Philadelphia, PA 19102
 Phone: 215-627-9999
 Fax: 215-627-9426
 Email: brianap@ericshore.com
Attorneys for Plaintiff

Filed and Attested by the
 Office of Judicial Records
 09 AUG 2023 03:14 pm
 S. RICE

Jennifer Kieu	:	COURT OF COMMON PLEAS
1342 Wagner Ave, Apt 2f	:	
Philadelphia, PA 19141	:	
	:	PHILADELPHIA COUNTY
Plaintiff,	:	
v.	:	No.: 230502189
	:	
Boonswang Law Firm	:	
1500 Sansom St #200	:	
Philadelphia, PA 19102	:	

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association
 Lawyer Referral
 and Information Service
 One Reading Center
 Philadelphia, Pennsylvania 19107
 (215) 238-6333 TTY (215) 451-6197

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascantar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion De Licenciados De Filadelfia
 Servicio De Referencia E Informacion Legal
 One Reading Center, Filadelfia, Pennsylvania 19107
 (215) 238-6333 TTY (215) 451-6197

THE LAW OFFICES OF ERIC A. SHORE

By: Briana Lynn Pearson, Esquire

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Email: brianap@ericshore.com

Attorneys for Plaintiff

Jennifer Kieu	:	COURT OF COMMON PLEAS
1342 Wagner Ave, Apt 2f	:	
Philadelphia, PA 19141	:	
	:	PHILADELPHIA COUNTY
	:	
Plaintiff,	:	
	:	
v.	:	No.: 230502189
	:	
Boonswang Law Firm	:	
1500 Sansom St #200	:	
Philadelphia, PA 19102	:	

CIVIL ACTION COMPLAINT

Plaintiff Jennifer Kieu for her complaint alleges as follows:

I. INTRODUCTION AND PARTIES.

1. This is an action under the Americans with Disabilities Act (ADA) and the Rehabilitation Act for discriminatory termination of Plaintiff Jennifer Kieu (hereinafter, "Plaintiff") by her employer, Boonswang Law Firm (hereinafter, "Defendant").

2. At all times relevant herein, Plaintiff, Jennifer Kieu, is an adult individual residing at the above address.

3. Defendant, Boonswang Law Firm, (hereinafter "Defendant" or "Boonswang") is a corporation organized and registered to do business in Pennsylvania, with a principle place of business at the above address.

4. Venue is proper because all of the acts and/or omissions occurred in Philadelphia, PA.

II. Operative Facts.

5. On or about November 14, 2022, Boonswang Law Firm's ("Defendant") hired Ms. Jennifer Kieu ("Plaintiff") as an Intake Coordinator. Ms. Kieu performed all duties asked of her without any complaints or issues.

6. Plaintiff suffers from multiple medical conditions, including kidney and skin issues, necessitating medical visits three times a week.

7. These medical visits were scheduled during her lunch break, to minimize disruption to her work schedule.

8. In or around November of 2022, Plaintiff was ten minutes late from a medical visit due to circumstances beyond her control.

9. At that time, Plaintiff disclosed to Defendant her multiple medical conditions and the need for her to attend doctor appointments during her lunch breaks.

10. Shortly after disclosing her medical conditions, Defendant commenced efforts to manage Plaintiff out of her position.

11. Less than three months following this disclosure on January 16, 2023, Plaintiff was terminated under pretextual reasons.

12. As a direct and proximate result of Defendant's conduct, Plaintiff sustained great economic loss, future lost earning capacity, lost opportunity, loss of future wages and earnings, as well as emotional distress, humiliation, pain and suffering, personal injury damages and other damages as set forth below.

III. Causes of Action.

**COUNT I
TITLE I CLAIM--AMERICANS WITH DISABILITIES ACT
ANTIDISCRIMINATION
(42 U.S.C.A. § 12101 et seq)**

13. Plaintiff re-alleges and incorporates by reference all previous paragraphs.

14. The Plaintiff is a qualified individual with a disability within the meaning of the ADA and the Rehabilitation Act.

15. The ADA and the Rehabilitation Act prohibit employers from discriminating against qualified individuals with disabilities.

16. The Defendant engaged in discriminatory practices by starting to manage Plaintiff out soon after the disclosure of her medical conditions.

17. Plaintiff was wrongfully terminated by the Defendant under the pretext of reasons that are not lawful reasons for termination under the ADA and the Rehabilitation Act.

**COUNT II
VIOLATION OF PENNSYLVANIA HUMAN RELATIONS
DISABILITY DISCRIMINATION
(43 P.S. § 951, et seq.)**

18. Plaintiff incorporates the preceding paragraphs as if fully set forth at length herein.

19. At all times material hereto, and pursuant to the Pennsylvania Human Relations Act, 43 P.S. § 951, et seq, an employer may not discriminate against an employee as a result of that employee's disability.

20. Plaintiff is a qualified employee and person within the definition of Pennsylvania Human Relations Act, 43 P.S. § 951, et seq.

21. Defendant is Plaintiff's "employer" and thereby subject to the strictures of the Pennsylvania Human Relations Act, 43 P.S. § 951, et seq.

22. Defendant's conduct in terminating Plaintiff is an adverse action, was taken as a result of her disability and constitutes a violation of the Pennsylvania Human Relations Act, 43 P.S. § 951, et seq.

23. As a proximate result of Defendant's conduct, Plaintiff sustained significant damages, including but not limited to: great economic loss, future lost earning capacity, lost opportunity, loss of future wages, loss of front pay, loss of back pay, as well as emotional distress, mental anguish, humiliation, pain and suffering, consequential damages and Plaintiff has also sustained work loss, loss of opportunity and a permanent diminution of her earning power and capacity and a claim is made therefore.

24. As a result of the conduct of Defendant's owners/management, Plaintiff hereby demands punitive damages.

25. Pursuant to the Pennsylvania Human Relations Act, 43 P.S. § 951, et seq., Plaintiff demands attorney's fees and court costs.

WHEREFORE, Plaintiff, Jennifer Kieu, demands judgment in her favor and against Defendant, Boonswang Law Firm, in an amount in excess of \$150,000.00 together with:

- A. Compensatory damages, including but not limited to: back pay, front pay, past lost wages, future lost wages. Lost pay increases, lost pay incentives, lost opportunity, lost benefits, lost future earning capacity, injury to reputation, mental and emotional distress, pain and suffering
- B. Punitive damages;
- C. Attorneys' fees and costs of suit;

D. Interest, delay damages; and,

E. Any other further relief this Court deems just proper and equitable.

LAW OFFICES OF ERIC A. SHORE, P.C.

Date: August 9, 2023

BY: /s/ Briana Lynn Pearson, Esquire

BRIANA LYNN PEARSON, ESQUIRE

(P.A. ID 327007)

Two Penn Center, Suite 1240

1500 John F. Kennedy Boulevard

Philadelphia, PA 19102

Telephone: 215-944-6113

Telefax: 215-627-9426

Email: brianap@ericshore.com

Attorney for Plaintiff, Jennifer Kieu

THE LAW OFFICES OF ERIC A. SHORE

By: Briana Lynn Pearson, Esquire

Attorney ID No. 327007

Two Penn Center, Suite 1240, 1500 John F. Kennedy Blvd.

Philadelphia, PA 19102

Phone: 215-627-9999

Fax: 215-627-9426

Email: brianap@ericshore.com*Attorneys for Plaintiff*

Filed and Attested by the
Office of Judicial Records
09 AUG 2023 03:14 pm
S. RICE

Jennifer Kieu	:	COURT OF COMMON PLEAS
1342 Wagner Ave, Apt 2f	:	
Philadelphia, PA 19141	:	
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Boonswang Law Firm	:	
1500 Sansom St #200	:	
Philadelphia, PA 19102	:	

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THE LAW OFFICES OF ERIC A. SHORE

By: Briana Lynn Pearson, Esquire

Attorney ID No. 327007

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Attorneys for Plaintiff

Jennifer Kieu	:	COURT OF COMMON PLEAS
1342 Wagner Ave, Apt 2f	:	
Philadelphia, PA 19141	:	
	:	PHILADELPHIA COUNTY
Plaintiff,	:	
	:	
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6. Plaintiff suffers from multiple medical conditions, including kidney and skin issues, necessitating medical visits three times a week.

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10. Shortly after disclosing her medical conditions, Defendant commenced efforts to manage Plaintiff out of her position.

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12. As a direct and proximate result of Defendant's conduct, Plaintiff sustained great economic loss, future lost earning capacity, lost opportunity, loss of future wages and earnings, as well as emotional distress, humiliation, pain and suffering, personal injury damages and other damages as set forth below.

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20. Plaintiff is a qualified employee and person within the definition of Pennsylvania Human Relations Act, 43 P.S. § 951, et seq.

21. Defendant is Plaintiff's "employer" and thereby subject to the strictures of the Pennsylvania Human Relations Act, 43 P.S. § 951, et seq.

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- B. Punitive damages;
- C. Attorneys' fees and costs of suit;

D. Interest, delay damages; and,

E. Any other further relief this Court deems just proper and equitable.

LAW OFFICES OF ERIC A. SHORE, P.C.

Date: August 9, 2023

BY: /s/ Briana Lynn Pearson, Esquire

BRIANA LYNN PEARSON, ESQUIRE

(P.A. ID 327007)

Two Penn Center, Suite 1240

1500 John F. Kennedy Boulevard

Philadelphia, PA 19102

Telephone: 215-944-6113

Telefax: 215-627-9426

Email: brianap@ericshore.com

Attorney for Plaintiff, Jennifer Kieu

FILED

11 AUG 2023 01:55 pm

Civil Administration

B. KOCH

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
 FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
 CIVIL TRIAL DIVISION

Jennifer Kieu

v.

Case No. 230502189

Boonswang Law Firm

CASE MANAGEMENT CONFERENCE MEMORANDUM
 CASE MANAGEMENT

Filing party: Jennifer Kieu by: Briana Pearson, EsquireCounsel's address and telephone number: Law Offices of Eric Shore

215-944-6113

2 Penn Center, Suite 1240 · 1500 JFK Boulevard
Philadelphia, PA 19102
brianap@ericshore.com

1. Date of contract or transaction dates: 2022
2. Date of birth of your individual client: _____
- _____ N/A _____ Unknown ☒ Decline to provide

NOTE: Date of birth information is intended for the Court's use only. The information will not be made available to the public.

3. Is there a writing? _____ yes ☒ no
- If yes, is there an allegation that the writing does not contain the entire agreement of the parties? _____ yes ☒ no

4. Is the Uniform Commercial Code applicable to this case? _____ yes ☒ no

5. Describe the nature of the conduct alleged as giving rise to the cause of action or, if defense, the nature of the defense:

Plaintiff disclosed to Defendant her multiple medical conditions and the need for her to attend doctor appointments during her lunch breaks. Shortly after disclosing her medical conditions, Defendant commenced efforts to manage Plaintiff out of her position. Less than three months following this disclosure, Plaintiff was terminated under pretextual reasons.

6. State the amount of the damages claimed by Plaintiff and explain how damages are calculated:
- (a) Direct Plaintiff claims approximately \$60,000.00 in current and future lost wages
- (b) Consequential Plaintiff claims \$50,000 in compensatory damages and \$50,000 in attorney's fees
- (c) Other (specify) _____

If yes, identify:

11. Identify applicable insurance coverage and note if there are insurance coverage issues:

unknown

12. Identify anticipated areas of expert testimony:

Emotional Distress/ Plaintiff's need for an accommodation

13. Requested Track: Expedited (13 months) Standard (18 months) Complex (24 months).

14. Additional Comments (if any):

N/A

15. Is this x Jury or Non-Jury matter?

16. Demand: \$ 160,000.00

Offer: \$

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
TRIAL DIVISION - CIVIL

BOONSWANG LAW FIRM
1500 SANSOM ST No.200
PHILADELPHIA, PA 19102

KIEU VS BOONSWANG LAW FIRM
230502189

SCHEDULING ORDER

AND NOW, AUGUST 02, 2023, it is hereby Ordered that:

1. A Case Management Conference is scheduled for August 14, 2023, at 11:00 A.M., using Zoom video conferencing.

2. Counsel and/or self-represented parties shall access the Case Management Conference through Zoom link posted on the following website under "Common Pleas-Civil Remote Hearing Information:"

<https://www.courts.phila.gov/remote-hearings/>

Scroll down within the section "Remote Hearing Information by Court Event Type" under "General Program Hearings" to "Case Management Conference." The Zoom link may be updated periodically, so use the Zoom link that is present on the date of the Conference.

3. Counsel for Plaintiff is directed to serve a copy of this Order on any unrepresented party and any attorney entering an appearance subsequent to the issuance of this Order.

4. Failure to file a Complaint or effectuate service of process prior to the conference date may result in the issuance of a Rule to Show Cause.

5. Five (5) days prior to the Case Management Conference date, all parties are required to electronically file with the Court and serve upon all opposing counsel and/or opposing parties not electronically served by the court a fully completed Case Management Memorandum.

SCHEDULING ORDER - Page 2

KIEU VS BOONSWANG LAW FIRM
230502189

Failure to timely file a Case Management Memorandum may result in monetary sanctions. To electronically file the Case Management Memorandum, access the "Existing Case" section of the court's electronic filing system. Select "Conference Submissions" as the filing category. Select "Management Memorandum" as the filing type. Any party not registered with the electronic filing system ("EFS") may submit the memorandum via e-mail or USPS first class mail:

CivilCaseManagement@courts.phila.gov
Civil Case Management Conference Center
613 City Hall
Philadelphia PA 19107

6. This conference will be conducted by a Civil Case Manager who shall act on behalf of the Honorable DANIEL ANDERS.

7. Counsel must be prepared to address all relevant issues concerning venue, service of process, pleadings, discovery, possible joinder of additional parties, theories of liability or defenses, and damages claimed.

8. At the conclusion of the conference a Case Management Order shall be entered which shall govern the case.

9. If the case settles prior to the conference, electronically file a settlement letter. To file the letter electronically, access the "Existing Case" section of the court's electronic filing system. Select "Conference Submissions" as the filing category. Select "Settlement Letter" as the document type.

10. Please direct any questions concerning this Order and its contents to CivilCaseManagement@courts.phila.gov or to 215-686-5135 or 215-686-3710.

11. Click the following link to access important documents related to the scheduled event:

<http://www.courts.phila.gov/pdf/forms/civil/CMC-105.pdf>

OFFICE OF THE DEPUTY
COURT ADMINISTRATOR

Court of Common Pleas of Philadelphia County
Trial Division**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)

MAY 2023

Filing Number: 2305049673

02189

PLAINTIFF'S NAME

JENNIFER KIEU

DEFENDANT'S NAME

BOONSWANG LAW FIRM

PLAINTIFF'S ADDRESS

1342 WAGNER AVE, APT 2F
PHILADELPHIA PA 19141

DEFENDANT'S ADDRESS

1500 SANSON ST #200
PHILADELPHIA PA 19102

PLAINTIFF'S NAME

DEFENDANT'S NAME

PLAINTIFF'S ADDRESS

DEFENDANT'S ADDRESS

PLAINTIFF'S NAME

DEFENDANT'S NAME

PLAINTIFF'S ADDRESS

DEFENDANT'S ADDRESS

TOTAL NUMBER OF PLAINTIFFS

1

TOTAL NUMBER OF DEFENDANTS

1

COMMENCEMENT OF ACTION

☐ Complaint☐ Petition Action☐ Notice of Appeal☒ Writ of Summons☐ Transfer From Other Jurisdictions

AMOUNT IN CONTROVERSY

☐ \$50,000.00 or less☒ More than \$50,000.00

COURT PROGRAMS

☐ Arbitration☒ Jury☐ Non-Jury☐ Other:☐ Mass Tort☐ Savings Action☐ Petition☐ Commerce☐ Minor Court Appeal☐ Statutory Appeals☐ Settlement☐ Minors☐ W/D/Survival

CASE TYPE AND CODE

1E - EMPLOYMENT, WRONGFUL DISCHARGE

STATUTORY BASIS FOR CAUSE OF ACTION

RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)

**FILED
PROTHONOTARY**IS CASE SUBJECT TO
COORDINATION ORDER?

YES

NO

MAY 22 2023**G. IMPERATO**

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: JENNIFER KIEU

Papers may be served at the address set forth below.

NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY

BRIANA PEARSON

ADDRESS

1500 JFK BLVD
SUITE 1240
PHILADELPHIA PA 19102

PHONE NUMBER

(215) 944-6113

FAX NUMBER

(856) 229-9991

SUPREME COURT IDENTIFICATION NO.

327007

E-MAIL ADDRESS

brianap@ericshore.com

SIGNATURE OF FILING ATTORNEY OR PARTY

BRIANA PEARSON

DATE SUBMITTED

Monday, May 22, 2023, 09:46 am

Court of Common Pleas of Philadelphia
County Trial Division
Civil Cover Sheet

For Office of Judicial Records Use Only (Docket Number)

PLAINTIFF'S NAME Jennifer Kieu^o		DEFENDANT'S NAME Boonswang Law Firm	
PLAINTIFF'S ADDRESS Philadelphia, PA 19141		DEFENDANT'S ADDRESS 1500 Sansom St #200, Philadelphia, PA 19102	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 1		TOTAL NO. OF DEFENDANTS 1	
COMMENCEMENT OF ACTION <input type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input checked="" type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions			
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00		COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Commerce (Completion of Addendum Required) <input type="checkbox"/> Other: _____	
CASE TYPE AND CODE (SEE INSTRUCTIONS) 1E: Employment, wrongful discharge			
STATUTORY BASIS FOR CAUSE OF ACTION (SEE INSTRUCTIONS)			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)			IS CASE SUBJECT TO COORDINATION ORDER? Yes <input type="checkbox"/> No <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
TO THE OFFICE OF JUDICIAL RECORDS: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY BRIANA PEARSON		ADDRESS (SEE INSTRUCTIONS) 1500 JFK BLVD., SUITE 1240 PHILADELPHIA PA 19102	
PHONE NUMBER (215)944-6113	FAX NUMBER (856)229-9991	E-MAIL ADDRESS brianap@ericshore.com	
SUPREME COURT IDENTIFICATION NO. 327007		DATE 05/22/2023	
SIGNATURE /s/ BRIANA PEARSON, ESQ.		Case ID: 230502189	

Instructions for Completing Civil Cover Sheet

Rules of Court require that a Civil Cover Sheet be attached to any document commencing an action (whether the action is commenced by Complaint, Writ of Summons, Notice of Appeal, or by Petition). The information requested is necessary to allow the Court to properly monitor, control and dispose cases filed. A copy of the Civil Cover Sheet must be attached to service copies of the document commencing an action. The attorney or non-represented party filing a case shall complete the form as follows:

A. Parties

i. *Plaintiffs/Defendants*

Enter names (last, first, middle initial) of plaintiff, petitioner or appellant ("plaintiff") and defendant. If the plaintiff or defendant is a government agency or corporation, use the full name of the agency or corporation. In the event there are more than three plaintiffs and/or three defendants, list the additional parties on the Supplemental Parties Form. Husband and wife are to be listed as separate parties.

ii. *Parties' Addresses*

Enter the address of the parties at the time of filing of the action. If any party is a corporation, enter the address of the registered office of the corporation.

iii. *Number of Plaintiffs/Defendants:* Indicate the total number of plaintiffs and total number of defendants in the action.

B. Commencement Type: Indicate type of document filed to commence the action.

C. Amount in Controversy: Check the appropriate box.

D. Court Program: Check the appropriate box.

E. Case Types: Insert the code number and type of action by consulting the list set forth hereunder. To perfect a jury trial, the appropriate fees must be paid as provided by rules of court.

Proceedings Commenced by Appeal

Minor Court

5M Money Judgment
5L Landlord and Tenant
5D Denial Open Default Judgment
5E Code Enforcement
Other:

Local Agency

5B Motor Vehicle Suspension -
Breathalyzer
5V Motor Vehicle Licenses,
Inspections, Insurance
5C Civil Service
5K Philadelphia Parking Authority
5Q Liquor Control Board
5R Board of Revision of Taxes
5X Tax Assessment Boards
5Z Zoning Board
52 Board of View
5I Other:

Other:

Proceedings Commenced by Petition

8P Appointment of Arbitrators
8C Name Change - Adult
8L Compel Medical Examination
8D Eminent Domain
8E Election Matters
8F Forfeiture
8S Leave to Issue Subpoena
8M Mental Health Proceedings
8G Civil Tax Case - Petition
Other:

Actions Commenced by Writ of Summons or Complaint

Contract

1C Contract
1T Construction
1O Other:

Tort

2B Assault and Battery
2L Libel and Slander
4F Fraud
1J Bad Faith
2E Wrongful Use of Civil Process
Other:

Negligence

2V Motor Vehicle Accident
2H Other Traffic Accident
1F No Fault Benefits
4M Motor Vehicle Property Damage
2F Personal Injury - FELA
2O Other Personal Injury
2S Premises Liability - Slip & Fall
2P Product Liability
2T Toxic Tort
T1 Asbestos
TZ DES
T2 Implant
3E Toxic Waste
Other:

Professional Malpractice

2D Dental
4L Legal
2M Medical
4Y Other:

IG Subrogation

Equity

E1 No Real Estate
E2 Real Estate
1D Declaratory Judgment
M1 Mandamus

Real Property

3R Rent, Lease, Ejectment
Q1 Quiet Title
3D Mortgage Foreclosure - Residential
Owner Occupied
3F Mortgage Foreclosure - Not Residential
Not Owner Occupied
1L Mechanics Lien
P1 Partition
Prevent Waste
1V Replevin
1H Civil Tax Case - Complaint
Other:

F. Commerce Program

Commencing January 3, 2000 the First Judicial District instituted a Commerce Program for cases involving corporations and corporate law issues, in general. If the action involves corporations as litigants or is deemed a Commerce Program case for other reasons, please check this block AND complete the information on the "Commerce Program Addendum". For further instructions, see Civil Trial Division Administrative Docket 01 of 2000.

G. Statutory Basis for Cause of Action

If the action is commenced pursuant to statutory authority ("Petition Action"), the specific statute must be identified.

H. Related Pending Cases

All previously filed related cases, regardless of whether consolidated by Order of Court or Stipulation, must be identified.

I. Plaintiff's Attorney

The name of plaintiff's attorney must be inserted herein together with other required information. In the event the filer is not represented by an attorney, the name of the filer, address, the phone number and signature is required.

The current version of the Civil Cover Sheet may be downloaded from the FJD's website
<http://courts.phila.gov>

THE LAW OFFICES OF ERIC A. SHORE

By: Briana Lynn Pearson, Esquire

Attorney ID No. 327007

Two Penn Center, Suite 1240, 1500 John F. Kennedy Blvd.

Philadelphia, PA 19102

Phone: 215-627-9999

Fax: 215-627-9426

Email: brianap@ericshore.com

Attorneys for Plaintiff

Filed and Attested by the
Office of Judicial Records
22 MAY 2023 09:46 am
G. IMPERATO

Jennifer Kieu	:	COURT OF COMMON PLEAS
Philadelphia, PA 19141	:	
	:	PHILADELPHIA COUNTY
	:	
Plaintiff,	:	
	:	
v.	:	No.:
	:	
Boonswang Law Firm	:	
1500 Sansom St #200	:	
Philadelphia, PA 19102	:	

PRAECIPE FOR WRIT OF SUMMONS

TO THE PROTHONOTARY:

Kindly issue a Writ of Summons in the above captioned civil action.

Respectfully requested,

LAW OFFICES OF ERIC A. SHORE

BY:



BRIANA LYNN PEARSON, ESQUIRE

Two Penn Center

1500 JFK Boulevard, Suite 1240

Philadelphia, PA 19102

Attorney for Plaintiff

Date: May 22, 2023

Commonwealth of Pennsylvania
COUNTY OF PHILADELPHIA

**Filed and Attested by the
Office of Judicial Records
22 MAY 2023 09:46 am
G. IMPERATO**

Jennifer Kieu

Plaintiff

COURT OF COMMON PLEAS

Term, 20____

vs.

No. _____

Boonswang Law Firm

Defendant

To¹

Boonswang Law Firm

1500 Sansom St #200

Philadelphia, PA 19102

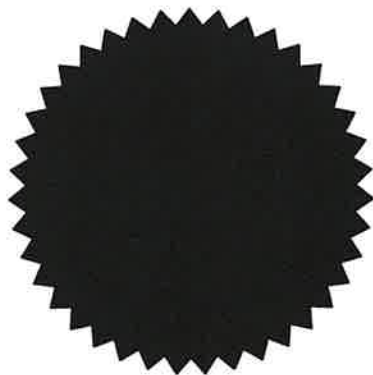
Writ of Summons

You are notified that the Plaintiff²
Usted esta avisado que el demandante

Jennifer Kieu

Philadelphia, PA 19141

Has (have) commenced an action against you.
Ha (han) iniciado una accion en contra suya.



ERIC FEDER
Director, Office of Judicial Records

By: _____

Date: 05/22/2023



¹ Name(s) of Defendant(s)

² Name(s) of Plaintiff(s)

Court of Common Pleas

____ Term, 20 ____

No. ____

Jennifer Kieu
Plaintiff

vs.

Boonswang Law Firm
Defendant

SUMMONS